

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

AMY GUSTAFSON,

Plaintiff,

v.

ALLSTATE VEHICLE AND PROPERTY
INSURANCE COMPANY, an Illinois
Corporation,

Defendant.

Case No. CIV-20-1136-R

**DEFENDANT ALLSTATE VEHICLE AND PROPERTY INSURANCE
COMPANY'S OBJECTIONS TO PLAINTIFF'S FINAL EXHIBIT LIST**

Defendant, Allstate Vehicle and Property Insurance Company, submits the following objections to Plaintiff's Final Exhibit List [Doc. No. 19]:

A. EXHIBITS EXPECTED TO BE UTILIZED

Ex.	Description of Document(s)	Objection(s)
1.	Allstate Policy A- 000187-241; 000401-454	
2.	Claim Notes A- 000001-38	
3.	Claim File A- 000044-400	
4.	First Notice of Loss Snapshot A- 000039-43	
5.	Photographs of Plaintiff's Home A- 000242-249	
6.	National Catastrophe Team Estimate A- 000250-332	
7.	Ian's Enterprise inspection report and estimate dated October 12, 2019 A- 000060-139; Gustafson 00014-96	Relevance, FRE 401, 402, 403; Foundation, FRE 701, 702; Hearsay, FRE 801, 802; Identification and authentication, FRE 901; Cumulative, FRE 403; Object to extent reference is made

		to building code and admittedly undamaged property.
8.	Field Roof Claim Assessment Form – Hail Damage A – 000455-457	
9.	Allstate Insurance Co. Claims Operations Manual A – 000458-637	FRE 901.
10.	Allstate Underwriting File A 000638-745	Relevance, FRE 401, 402, 403.

B. EXHIBITS WHICH MAY BE UTILIZED

11.	Email communication between Ian Rupert and Allstate claims Gustafson 00097-99; 101-105; 351-352	Identification and authentication, FRE 901
12.	Ian's Enterprise LLC Claim File Gustafson 000356-363; IAN 1-611	Vague and overly broad; Relevance, FRE 401, 402, 403; Foundation, FRE 701, 702; Hearsay, FRE 801, 802; Identification and authentication, FRE 901; Cumulative FRE 403; Object to extent reference is made to building code and admittedly undamaged property.; Property admittedly not damaged by storm.
13.	Ian Rupert text communications with Plaintiff Gustafson 000365-399	Relevance, FRE 401, 402, 403; Foundation, FRE 701, 702; Hearsay, FRE 801, 802; Identification and authentication, FRE 901
	All documents Plaintiff has requested but Defendant has not yet produced.	Vague, overly broad; Identification and authentication, FRE 901; Other objections reserved until identified.
	All documents produced by Plaintiff and not objected to by Defendant	Vague, overly broad; Identification and authentication, FRE 901; Other objections reserved until identified.
	All documents produced by Defendant and not objected to by Plaintiff	Vague, overly broad; Identification and authentication, FRE 901; Other objections reserved until identified.
	All documents or demonstrative exhibits relied upon by expert witnesses.	Vague, overly broad; Identification and authentication, FRE 901; Other objections reserved until identified.

	Defendant's exhibits not objected to by Plaintiff	Vague, overly broad; Identification and authentication, FRE 901; Other objections reserved until identified.
	All exhibits used in depositions not objected to by Plaintiff	Vague, overly broad; Identification and authentication, FRE 901; Other objections reserved until identified.

Respectfully submitted,

s/ RONALD L. WALKER
RONALD L. WALKER, OBA #9295
JERRY D. NOBLIN, JR. OBA #20296
TOMLINSON MCKINSTRY P.C.
Two Leadership Square, Suite 450
211 North Robinson Ave.
Oklahoma City, Oklahoma 73102
Telephone: 405/606.3370
Facsimile: 877/917.1559
ronw@TMOKlaw.com
jerryn@TMOKlaw.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Simone Fulmer, OBA #17037
Harrison C. Lujan, OBA #30154
Jacob L. Rowe, OBA #21797
Andrea R. Rust, OBA #30422
FULMER SILL PLLC
1101 N. Broadway Ave., Suite 102
Oklahoma City, OK 73103
Telephone: (405) 510-0077
Facsimile: (800) 978-1345
sfulmer@fulmersill.com
hlujan@fulmersill.com
jrowe@fulmersill.com
arust@fulmersill.com
Attorneys for Plaintiff

s/ RONALD L. WALKER